

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE

☐ Eastern (Jackson) DIVISION  
☒ Western (Memphis) DIVISION

Travis I. Hopps )  
 )  
Plaintiff, )  
 )  
vs. Lowe's Home Center, LLC )  
 )  
 )  
Defendant. )

RECEIVED  
17 JUL -7 PM 2:06  
CLERK OF DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
MEMPHIS

COMPLAINT

1. This action is brought for discrimination in employment pursuant to (check only those that apply):



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166) (race, color, gender, religion, national origin).

*NOTE: In order to bring a suit in federal district court under Title VII, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.*



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 - 634 (amended in 1984, 1990, and by the Age Discrimination in Employment Amendments of 1986, Pub. L. No. 92-592, the Civil Rights Act of 1991, Pub. L. No. 102-166)

*NOTE: In order to bring a suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 - 12117 (amended by the ADA Amendments Acts of 2008, Pub. L. No. 110-325 and the Civil Rights Act of 1991, Pub. L. No. 1102-166).

*NOTE: In order to bring a suit in federal district court under the Americans with Disabilities Act, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.*

**JURISDICTION**

2. Jurisdiction is specifically conferred upon this United States District Court by the aforementioned statutes, as well as 28 U.S.C. §§ 1331, 1343. Jurisdiction may also be appropriate under 42 U.S.C. §§ 1981, 1983 and 1985(3), as amended by the Civil Rights Act of 1991, Pub. L. No. 102-166, and any related claims under Tennessee law.

**PARTIES**

3. Plaintiff resides at:

906 Russell Circle  
STREET ADDRESS  
Shelby, Tennessee, 38133, 901-828-3552  
County State Zip Code Telephone Number

4. Defendant(s) resides at, or its business is located at:

1000 Lowe's Boulevard  
STREET ADDRESS  
Iredell, Mooresville, North Carolina 28117  
County City State Zip Code

NOTE: If more than one defendant, you must list the names, address of each additional defendant.

---

---

---

---

---

---

---

5. The address at which I sought employment or was employed by the defendant(s) is:

8300 Highway 64 Bartlett, Tennessee 38133

STREET ADDRESS

Shelby, Bartlett, Tennessee, 38133  
County City State Zip Code

6. The discriminatory conduct of which I complain in this action includes *(check only those that apply)*

- ☐ Failure to hire
- ☒ Termination of my employment
- ☐ Failure to promote
- ☐ Failure to accommodate my disability
- ☒ Unequal terms and conditions of my employment
- ☒ Retaliation
- ☒ Other acts(specify): Wrongful Termination

**NOTE:** Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.

7. It is my best recollection that the alleged discriminatory acts occurred on:  
Jan 2015 report to Dane Parker (ASM)  
Date(s)

8. I believe that the defendant(s) *(check one)*:

- ☒ is still committing these acts against me.
- ☐ is not still committing these acts against me.

9. Defendant(s) discriminated against me based on my:  
*(check only those that apply and state the basis for the discrimination. For example, if religious discrimination is alleged, state your religion. If racial discrimination is alleged, state your race, etc.)*

- ☒ Race African American
- ☒ Color Black
- ☐ Gender/Sex \_\_\_\_\_
- ☐ Religion \_\_\_\_\_
- ☐ National Origin \_\_\_\_\_
- ☐ Disability \_\_\_\_\_
- ☐ Age. If age is checked, answer the following:  
I was born in \_\_\_\_\_. At the time(s) defendant(s) discriminated against me.

I was [ ] more [ ] less than 40 years old. (check one)

**NOTE:** Only those grounds raised in the charge filed the Equal Employment Opportunity Commission can be considered by the federal district court.

10. The facts of my case are as follows:

Violating several laws code of Tennessee  
Tennessee Decision of Commissioner support my claim on  
Sheets.

Never mention my <sup>real</sup> Supervisor Dane Parker at all  
in the case.

Never violated any policy at Lowe's read the Decision  
Documents.

(Attach additional sheets as necessary)

**NOTE:** As additional support for your claim, you may attach to this complaint a copy of the

*charge filed with the Equal Employment Opportunity Commission or the Tennessee Human Rights Commission.*

11. It is my best recollection that I filed a charge with the Tennessee Human Rights Commission regarding defendant's alleged discriminatory conduct on: \_\_\_\_\_
12. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct on: Nov 2015.  
Date

**Only litigants alleging age discrimination must answer Question #13.**

13. Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct. (*check one*):

- ☐ 60 days or more have elapsed
- ☒ Less than 60 days have elapsed.

14. The Equal Employment Opportunity Commission (*check one*):

- ☐ has not issued a Right to Sue Letter.
- ☒ has issued a Right to Sue letter, which I received on Apr 27, 2017.  
Date

**NOTE:** *This is the date you received the Right to Sue letter, not the date the Equal Employment Opportunity Commission issued the Right to Sue letter.*

15. Attach a copy of the Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.

**NOTE:** *You must attach a copy of the right to sue letter from the Equal Employment Opportunity Commission.*

16. I would like to have my case tried by a jury:

- ☐ Yes
- ☒ No

**WHEREFORE**, plaintiff prays that the Court grant the following relief:

- ☐ direct that the Defendant employ Plaintiff, or
- ☐ direct that Defendant re-employ Plaintiff, or
- ☐ direct that Defendant promote Plaintiff, or
- ☐ order other equitable or injunctive relief as follows: \_\_\_\_\_
- \_\_\_\_\_
- ☐ direct that Defendant pay Plaintiff back pay in the amount of \_\_\_\_\_ and interest on back pay;
- ☒ direct that Defendant pay Plaintiff compensatory damages: Specify the amount and basis for compensatory damages: \_\_\_\_\_
- \$650,000 dollars

T. H. S.  
SIGNATURE OF PLAINTIFF

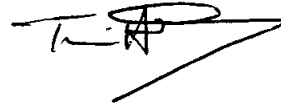
Date: July 5, 2017

906 Russell Circle  
Address  
Memphis, TN 38108  
901-828-3552  
Phone Number

July 5,2017

My alleged incident started Jan 2015 to Dane Parker Assistant store manager who my supervisor for a year and 5 months before Mike Halley (ASM) took over three months of my discharge. I reported numerous allegation from discrimination and retaliation to Dane Parker (ASM) about Mike Halley from Jan 2015 and Sept 2015 but I was unable to stop name calling like "BOY" come here or singling me out because I'm BLACK. Lowe's did a poor job of protecting my right under law 501-1-801,47-18-802 and 50-7-303 from discrimination, retaliation and wrongful discharge for misconduct of these codes. Furthermore, notices in all the reports with Lowe's never once mention Dane Parker was my mediate supervisor for a year and half before Mike Halley became my mediate supervisor for three months of my discharger. I later found out from a good source they were colleagues and Dane never reported my issues to HR or upper Management. Here is some fact that need to be addressed in this case.

Thank Travis

A handwritten signature in black ink, appearing to be 'Travis', with a long horizontal stroke extending to the right.